

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF INDIANA  
 SOUTH BEND DIVISION

KASTURI HALDAR,	)	
	)	
Plaintiff,	)	Case No.: 3:24-cv-836-CCB-SJF
	)	
v.	)	
	)	
UNIVERSITY OF NOTRE DAME	)	
DU LAC, SANTIAGO SCHNELL, and	)	
CINDY PARSEGHIAN	)	
	)	
Defendants.	)	

**MOTION OF DEFENDANTS UNIVERSITY OF NOTRE DAME DU LAC, SANTIAGO SCHNELL, AND CINDY PARSEGHIAN TO PARTIALLY DISMISS THE COMPLAINT**

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendants University of Notre Dame du Lac (“the University”), Santiago Schnell (“Dean Schnell”), and Cindy Parseghian hereby move to dismiss Counts I (in part), II, III, and VII of the Complaint filed by Plaintiff Kasturi Haldar against the University, Counts I (in part) and V of the Complaint against Dean Schnell, and Counts I and IV of the Complaint against Ms. Parseghian, for the reasons set forth in detail in the accompanying memorandum of law.

WHEREFORE, Defendants respectfully request that this Court grant their Motion to Partially Dismiss the Complaint and dismiss the above-referenced counts of Plaintiff’s Complaint.<sup>1</sup>

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<sup>1</sup> The University and Dean Schnell do not waive any rights as to claims that are not addressed in this Motion to Partially Dismiss. *See Ello v. Brinton*, No. 2:14-CV-299-TLS, 2015 WL 7016462, at \*4 (N.D. Ind. Nov. 10, 2015); *Richter v. Corporate Fin. Assocs., LLC*, No. 1:06-cv-1623-JDT-TAB, 2007 WL 1164649, at \*2 (S.D. Ind. Apr. 19, 2007) (finding that the filing of the defendants’ motion to dismiss the third claim tolled the time to answer the first and second claims). The University and Dean Schnell will answer those claims on which they are not moving in the time provided for in accordance with the Federal Rules of Civil Procedure and Local Rules.

Respectfully submitted,

Date: November 21, 2024

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*Attorneys for Defendant University of Notre Dame  
du Lac, Santiago Schnell, and Cindy Parseghian*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been electronically filed this 21<sup>st</sup> day of November, 2024, with a copy served on all counsel of record via CM-ECF.

/s/ Michael P. Palmer  
Barnes & Thornburg LLP